

# FEDERAL LAWSUIT UNDER 42 U.S.C.A. § 1983

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

Noah Freeman

RECEIVED

Prison ID # \_\_\_\_\_

NOV 30 2022

US DISTRICT COURT  
MID DIST TENN

Prison ID # 592238

Prison ID # \_\_\_\_\_

Plaintiff(s)

[LIST THE NAMES OF ALL  
PLAINTIFFS FILING THIS  
LAWSUIT; DO NOT USE  
“ET AL”]

03-22 0963

vs.

CIVIL ACTION NO.: \_\_\_\_\_

[To be assigned by the Clerk’s Office.

Do not write in this Blank.]

Tennessee,  
Department  
of Correction  
Unit Manager  
Loving Defendant(s)

[LIST THE NAMES OF ALL  
DEFENDANTS AGAINST  
WHOM YOU ARE FILING  
THIS LAWSUIT; DO NOT  
USE “ET AL”]

(IF YOU NEED MORE SPACE TO LIST OTHER PLAINTIFFS AND/OR DEFENDANTS, SO INDICATE AND ATTACH  
A SEPARATE SHEET OF PAPER.)

## COMPLAINT FOR VIOLATION OF CIVIL RIGHTS UNDER 42 U.S.C.A. § 1983

I. PREVIOUS LAWSUITS

A. Have you or any of the other plaintiffs listed above filed any other lawsuits in the United States District Court for the Middle District of Tennessee and/or any other state or federal court?

Yes \_\_\_\_\_

No

B. If you answered YES to Question A, list the following information:  
(If you have filed more than one lawsuit, list the additional lawsuits on another sheet of paper, using the same outline as below.)

1. Parties to previous lawsuit:

Plaintiffs: \_\_\_\_\_

Defendants: N/A

2. In what Court did you file the previous lawsuit?

N/A  
(If Federal Court, name the District; if State Court, name the county.)

3. Case Number of the previous lawsuit: \_\_\_\_\_

4. Name of the Judge to whom the case was assigned: \_\_\_\_\_

5. When did you file the previous lawsuit? \_\_\_\_\_

(Indicate the year if you do not know the exact month or day.)

6. What was the disposition or result of the previous lawsuit? (For example, was it dismissed, appealed, or still pending?)  
\_\_\_\_\_

7. When was the previous lawsuit decided by the Court? \_\_\_\_\_

(Indicate the year if you do not know the exact month or day.)

8. Did the previous lawsuit involve the same facts or circumstances that you are alleging in the lawsuit you are now submitting?

Yes  No

(If you have filed more than one prior lawsuit, list the additional lawsuit(s) on a separate sheet of paper, and provide the same information for the additional lawsuit(s).)

**II. PLACE OF PLAINTIFF(S) CURRENT CONFINEMENT: (The following information must be provided by each inmate plaintiff.)**

A. Name and address of the prison or jail in which you are currently incarcerated:

Lois M. Debell Special Needs  
Facility T.D.O.C  
7575 Cockrell Bend Blvd  
Nashville TN 37209

B. Are the facts of your lawsuit related to your present confinement?

Yes  No

*Walk  
F...*

C. If you answered NO to Question B, list the name and address of the jail or prison to which the facts of your lawsuit relate:

\_\_\_\_\_

D. Do the facts of your lawsuit relate to your confinement in a Tennessee State prison?

Yes  No \_\_\_\_\_

If you checked "No", proceed to question II H.

E. If you answered YES to Question D, did you present these facts to the prison authorities through the state prisoner grievance procedure?

Yes  No \_\_\_\_\_

F. If you answered YES to Question E above:

1. What steps did you take: TEhn DEP of  
CORRECTION inmate Grievance
2. What was the result: They concurred  
with the Supervisor's

G. If you answered "No" to Question E above, explain why not:

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H. Do the facts of your lawsuit pertain to your confinement in a detention facility operated by city or county law enforcement agencies (jail, workhouse, etc.)?

Yes \_\_\_\_\_

No X

I. If you checked "Yes" in H above, have you presented these facts to the authorities who operate the detention facility?

Yes \_\_\_\_\_

No \_\_\_\_\_

J. If you checked "Yes" in I above:

1. What steps did you take?

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2. What was the response of the authorities who run the facility?

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K. If you checked "No" in I above, explain why not.

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**(Attach copies of all grievance related materials including, at a minimum, a copy of the grievance you filed on each issue raised in this complaint, the prison's or jail's response to that grievance, and the result of any appeal you took from an initial denial of your grievance.)**

III. PARTIES TO THIS LAWSUIT

A. Plaintiff(s) bringing this lawsuit:

1. Name of First Plaintiff: Noah Freeman

Prison ID Number of First Plaintiff: 592238

Address of First Plaintiff: 7575 Cockrell  
Bend Boulevard Nashville  
TN 37209-1057

(Include name of institution and mailing address)

2. Name of Second Plaintiff: \_\_\_\_\_

Prison ID Number of Second Plaintiff: \_\_\_\_\_

Address of Second Plaintiff: \_\_\_\_\_

\_\_\_\_\_

(Include name of institution and mailing address)

3. Name of Third Plaintiff: \_\_\_\_\_

Prison ID Number of Third Plaintiff: \_\_\_\_\_

Address of Third Plaintiff: \_\_\_\_\_

\_\_\_\_\_

(Include name of institution and mailing address)

IF THERE ARE MORE THAN THREE PLAINTIFFS, LIST THEIR NAMES, PRISON IDENTIFICATION NUMBERS AND ADDRESSES ON AN ATTACHED SHEET OF PAPER.

B. Defendants Against Whom You Are Filing This Lawsuit:

1. Name of First Defendant:

T.D.O.C

Place of Employment of First Defendant:

T.D.O.C

Address of First Defendant: 6 floor Rache Jackson bldg  
320 6<sup>th</sup> Ave North  
Nashville TN 37243

2. Name of Second Defendant:

unit manage Loving

Place of Employment of Second Defendant:

T.D.O.C

Address of Second Defendant:

7575 COCKRILL

bend bouq Nashville TN 37209

3. Name of Third Defendant:

Place of Employment of Third Defendant:

Address of Third Defendant:

Named in official capacity?  YES  NO

Named in individual capacity?  YES  NO

IF YOU ARE BRINGING THIS LAWSUIT AGAINST MORE THAN THREE DEFENDANTS, YOU MUST LIST EACH DEFENDANT'S NAME, PLACE OF EMPLOYMENT, ADDRESS, AND THE CAPACITY ON WHICH YOU ARE SUING THEM, ON AN ATTACHED SHEET OF PAPER.

IF YOU DO NOT LIST EACH DEFENDANT'S NAME, ANY SUCH DEFENDANT WILL NOT BE INCLUDED IN YOU LAWSUIT; IF YOU DO NOT LIST EACH DEFENDANT'S NAME, PLACE OF EMPLOYMENT AND ADDRESS, THE CLERK WILL NOT BE ABLE TO SERVE ANY SUCH DEFENDANT SHOULD PROCESS ISSUE.

IV. STATEMENT OF YOUR CLAIM

State as briefly as possible the facts of your case. Recite the dates when any incidents or events occurred, and the places where such incidents or events took place. Describe how each defendant is involved. Also include the names of other persons involved and the dates and places of their involvement.

If you set forth more than one claim, number each claim separately and set forth each claim in a separate paragraph:

I am a T.D.O.C inmate. I inmate at this institution in 7D can't get book from the library. I am a mental health inmate and being lock in a cell with no reading book increases the likelihood of a mental breakdown. The Federal Funding for Library book and legal aide are not being offered to us. This is unlawful under the (A.D.A) American Disability Act. Rules of confinement.

IF YOU NEED ADDITIONAL SPACE, ATTACH SEPARATE SHEET(S) OF PAPER

V. RELIEF REQUESTED: List what you want the Court to do; list what relief you seek against each defendant:

- A. Penalize
- B. Pay money for Pain and suffering
- C. menace Them To do Right
- D. and a Public Apology
- E. \_\_\_\_\_

I request a Jury Trial: Yes X No \_\_\_\_\_

I (we) hereby certify under penalty of perjury that the above complaint is true to the best of my (our) information, knowledge and belief.

Signed this 20 day of NOV, 20 22.

Signature: Noah Freeman

Printed Name: Noah Freeman

Prison ID Number: 592238

Address: 2575 Cockrell

Bend Blvd Nashville TN

(Include city, state and zip code)

37209

Signature: Noah Freeman

Printed Name: Noah Freeman

Prison ID Number: 592238

Address: \_\_\_\_\_

(Include city, state and zip code)

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Prison ID Number: \_\_\_\_\_

Address: \_\_\_\_\_

\_\_\_\_\_ (Include city, state and zip code)

**ALL PLAINTIFFS MUST SIGN THE COMPLAINT.** If there are more than three plaintiffs, attach additional signatures with prison identification numbers and addresses.

**ALL PLAINTIFFS MUST COMPLETE, SIGN, AND DATE SEPARATE APPLICATIONS TO PROCEED IN FORMA PAUPERS.** If not paying the civil filing fee.

**SUBMIT THE COMPLAINT, THE REQUIRED FILING FEE (OR THE APPLICATION TO PROCEED IN FORMA PAUPERS) TOGETHER.** Complaints received without the required filing fee or application to proceed *in forma pauperis* will be returned.

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**Plaintiff(s) would request for a SUMMONS packet, U.S. Marshal Form 285, and any other necessary documents to be issued to he/they once the case is opened.**

**Plaintiff(s) will return these forms in order to be signed and sealed so they may be attached to the complaint and then issued to the Defendants named upon the summons and listed within this complaint.**

**DECLARATION OF MAILING**

I, Noah Freeman, declare under penalty of perjury that the foregoing 42 U.S.C.A. § 1983 complaint for civil rights violation, along with the correct amount of copies for each defendant named in the complaint, has been sent/given to the Institutional Mailroom where I am currently housed at with sufficient Postage to reach the below described designation.

Court Name/Address:

7575 COCKRILL  
Bend Boulevard  
Nashville TN  
37209

On this the 20, day of NOV, 2022.

Noah Freeman  
(Signature)  
Noah Freeman  
(Printed Name)

7575 COCKRILL  
Bend Boulevard  
Nashville TN  
37209

(Institutional Name and Address)



## TENNESSEE DEPARTMENT OF CORRECTION

INMATE GRIEVANCE

RECEIVED

NOV 30 2022

US DISTRICT COURT  
MID DIST TENN

# 15512

Noah Freeman 592238 SPND 7D118  
NAME NUMBER INSTITUTION & UNIT

DESCRIPTION OF PROBLEM: In 7D on 10-18-22 to 10-25-22 The books was taking for us. We can't have books

REQUESTED SOLUTION: To give us books back

Noah Freeman

10-25-22

Signature of Grievant

Date

TO BE COMPLETED BY GRIEVANCE CLERK

356315

Grievance Number

10-28-22

Date Received

W. T. Tolman

Signature Of Grievance Clerk

INMATE GRIEVANCE COMMITTEE'S RESPONSE DUE DATE: \_\_\_\_\_

AUTHORIZED EXTENSION: \_\_\_\_\_ New Due Date \_\_\_\_\_ Signature of Grievant \_\_\_\_\_

## INMATE GRIEVANCE RESPONSE

Summary of Supervisor's Response/Evidence: See CR-3148

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OCT 30 2022

Chairperson's Response and Reason(s): Concur With Supervisor's Response

DATE: 11/7/22 CHAIRPERSON: Col. N. \_\_\_\_\_

Do you wish to appeal this response? YES  NO

If yes: Sign, date, and return to chairman for processing within five (5) days of receipt of first-level response.

Noah Freeman 10-28-22 W. T. Tolman  
GRIEVANT DATE WITNESS

Distribution Upon Final Resolution:

White - 11/10/2022 - Document 1 Filed 10/30/22 Page 11 of 16 PageID# 1118  
Case 3:22-cv-00068



TENNESSEE DEPARTMENT OF CORRECTION  
RESPONSE OF SUPERVISOR OF GRIEVED EMPLOYEE OR DEPARTMENT

DATE: \_\_\_\_\_

Please respond to the attached grievance, indicating any action taken.

Date Due: \_\_\_\_\_

Grievance Number

Inmate Name

Inmate Number

From The Library of from  
The REC Therapist. This is unlawful  
under THE (A.D.A) American disability  
ACT. and is increasing the likelihood  
of a mental breakdown. The books  
was taking by the unit manager  
and T.D.O.C hit federal  
Funding for The Library to give us  
ACCESS to books and legal ACCESS.

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01-08-2021

Mal

JM

SIGNATURE

DATE



Tennessee Department of Corrections  
Response of Supervisor of Grievous Employee or Department

7D/18  
7P/102

DATE: Thursday, November 03, 2022 Please respond to the attached grievance, indicating any action taken.

Date Due: 11/08/2022

356315/15512

Noah Freeman

# 592238

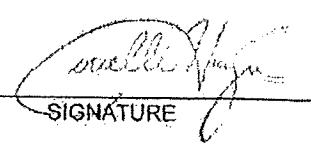
Grievance Number

Inmate Name

Inmate Number

I concur with the supervisor's response. As long as the books are still being "offered" to offenders, there is no need to use the book cart if the usage of the book cart is being abused.

NOV 07 2022  
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SIGNATURE

11/4/22  
DATE

White- Inmate Grievant

Canary- Warden

Pink- Grievance Committee

Goldenrod-Commissioner

To Clerk Lynda Hill  
Please file and mail  
me a copy thank you

RECEIVED

NOV 30 2022

US DISTRICT COURT  
MID DIST TENN

Noah  
Freemath

Noah Freemath

11-20-22

Time 22:30

S.P.N.D.T.D.O.C  
NOAH#592238  
Freeman

7575 Cockrell Bend Blvd  
Nashville TN 37209

RECEIVED  
NOV 30 2022  
US DISTRICT COURT  
MID DIST TERM

Legal  
Mail



THE DEPT OF CORRECTION  
HAS NEITHER CENSORED NOR  
INSPECTED THIS ITEM THEREFORE  
DOES NOT ASSUME RESPONSIBILITY  
FOR ITS CONTENTS

Clerk  
Lynda M. Hill

719 Church St  
Nashville TN  
37203

Noah Freeman  
# 592238  
TD 102